

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Keith R. Murphy
Donna A. Tobin
Kimberly M. Maynard

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ROBERT GREENBERGER and

PHYLLIS GREENBERGER,

Defendants.

Adv. Pro. No. 10-05408 (SMB)

**STIPULATION FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITHOUT PREJUDICE**

Irving H. Picard, as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and defendants Robert Greenberger and Phyllis Greenberger, by and through their counsel, Lax & Neville LLP, in accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(A)(ii) (making Federal Rule of Civil Procedure 41(a)(1) applicable in adversary proceedings), hereby stipulate to a dismissal of the above-captioned adversary proceeding without prejudice.

Dated: February 23, 2015

BAKER & HOSTETLER LLP

By: /s/ Donna A. Tobin
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Keith R. Murphy
Email: kmurphy@bakerlaw.com
Donna A. Tobin
Email: dtobin@bakerlaw.com
Kimberly M. Maynard
Email: kmaynard@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard, Trustee for
the Liquidation of Bernard L. Madoff Investment
Securities LLC and the estate of Bernard L. Madoff*

LAX & NEVILLE LLP

By: /s/ Gabrielle J. Pretto

1450 Broadway, 35th Floor

New York, New York 10018

Telephone: (212) 696-1999

Facsimile: (212) 566-4531

Brian Neville

Email: bneville@laxneville.com

Gabrielle J. Pretto

Email: gpretto@laxneville.com

*Attorneys for Defendants Robert Greenberger and
Phyllis Greenberger*